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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

In the Matter of

Petition to Amend Part 68 of the
Commission's Rules to Include Terminal
Equipment Connected to Public Switched
Digital Service.

93-268 /
RM 6147

BELLSOUTH'S COMMENTS ON
PETITION OF THE AMERITECH OPERATING COMPANIES
FOR RULEMAKING

BellSouth Corporation, South Central Bell Telephone Company, and Southern Bell Telephone and Telegraph Company ("BellSouth") hereby comment on the Petition of the Ameritech Operating Companies for Rulemaking ("the Petition") filed October 26, 1987. BellSouth supports the Petition to the extent that it points to the need to have Part 68 protections applied to terminal equipment ("CPE") connected to Public Switched Digital Services ("PSDS"). However, BellSouth asks the Commission to hold the Petition in abeyance until additional activities described below can be completed.

In requesting the Commission to hold the Petition in abeyance, BellSouth does not challenge Ameritech's fundamental premise, namely that there is a need to protect the network from harms that may be caused by PSDS CPE. BellSouth readily acknowledges the vital role Part 68 has played in attaining the Commission's goals of promoting

competition in the CPE market while protecting the public network from harm and allowing it to evolve technologically.

Nonetheless, BellSouth believes that the Commission should not act on the Petition at this time because the rules Ameritech purposes are overly complex, are limited to two specific technologies, contain performance standards in addition to "harms to the network" protections, and do not address all of the known harms to the network issues generically. Thus, promulgating the proposed rules will not achieve the Commission's goals.

As Ameritech acknowledges, Petition at 2, the purposed rules are technologically limited to two existing implementations-- AT&T's CSDS and NTI's Datapath. For example, the proposed rules specify the exact pulse repetition rates, output pulse templates and scrambler characteristics used by AT&T and NTI. It is highly unlikely that other manufacturers will design their products to these performance-related standards except to meet Commission-imposed transport schemes. While other manufacturers may conform to the rules in order to avoid the risk that the Commission might not change the rules to accommodate a new and better design, this would have the undesirable effect of stifling innovation.

Adoption of the proposed rules would also extend the Commission's involvement beyond the original purpose of Part 68, namely, prevention of harms to the network. For

example, the proposed rules include specific signal pulse criteria. While BellSouth acknowledges the need for restraints on both signal power and spectral distribution to protect the network from harm, it believes that the specific language of the proposed rules is too narrowly limited to existing technologies and thus amounts to performance standards for those technologies.¹ Part 68 should not deal with such performance issues: such issues can be dealt with more effectively through standards setting organizations.²

Moreover, since the energy spectral distribution of PSDS loop transport overlaps that of ISDN, the Commission can more effectively use its resources by developing harms to the network protections for both PSDS and ISDN at the same time. However, the potential for adjacent service interference among a multiplicity of loop transport

¹ The existing technological interface disclosure documents cited in Ameritech's Petition appear to prevent harm to the network. However, this view is based on insufficient experience with digital loop transmission at or near the subject bit rates. PSDS is assigned on a relatively unrestricted basis in the network so potential for affecting nearby pairs carrying other services is significant. This concern will be increased with ISDN deployment since ISDN basic rate services overlap PSDS in energy spectral distribution. Therefore, PSDS signal power must be limited to levels which will ensure margin to avoid crosstalk onto ISDN circuits.

² Past experience with the Commission's decisions regarding digital NCTE demonstrates that rules that foster technology-dependent interfaces do not promote the public interest and unnecessarily hinder network evolution. The proposed rules are technology, indeed vendor, specific. Their adoption would institutionalize those technologies and make network innovation and evolution unnecessarily difficult.

technologies needs additional investigation before specific rules can be promulgated. Such rules could be flexible enough to cover other loop technologies, such as data/voice multiplexing, which operate in the same spectral area. In order to do this, however, additional technical matters would need to be investigated.

BellSouth believes that a rulemaking proceeding is not the most appropriate forum in which to conduct such a technology-related investigation. Rather, such matters can be most effectively pursued in standards setting bodies such as ECSA's T1 Committee. Although T1 was unable to develop a single set of performance specifications for PSDS (due to differences in technology-dependent interfaces), BellSouth believes that T1 could be more successful in identifying more narrowly focused signal power-related harms to the network issues. After T1 has identified such harms to the network issues, the Commission, with industry input, could promulgate clear, simple Part 68 rules to protect against such harms without also extending into performance-related areas.

The risks associated with the delay needed to conduct such further technical evaluations are minimal. As Ameritech acknowledges, current PSDS deployment is limited. Cf. Petition at 3. Moreover, existing PSDS tariffs often contain or refer to performance-related technical

specifications which, when met by PSDS CPE manufacturers, appear to provide adequate harms protections.

Indeed, such an approach is similar to that followed by the Commission in "interim plans" that typically precede each new phase of the Registration Program. A major advantage of such an approach is that the specifications can be changed quickly as subsequent experience dictates. Thereafter, as the technologies stabilize, the Commission can promulgate rules designed to establish formally the harms protections.

WHEREFORE, for the reasons stated above, BellSouth asks the Commission to hold Ameritech's Petition in abeyance until additional technical investigations can be performed by the T1 Committee to identify the harms to the network issues raised by PSDS and ISDN.

Respectfully submitted,


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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Comments were served this 9th day of December, 1987, by first class mail, postage prepaid to:

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